

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASS.

WILLIAM FOLEY,
Plaintiff,

V.

ALCATEL USA, INC.,
Defendant.

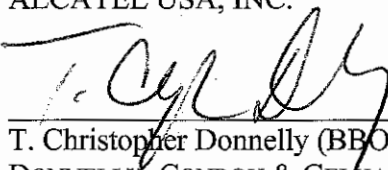
Civil Action No. 04- 12126 EFH

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION TO COMPEL (ASSENTED TO)**

Defendant Alcatel USA, Inc. ("Alcatel") respectfully requests that the Court allow it up to and including September 16, 2005, to file a response to plaintiff's motion to compel the production of documents. As grounds for the request for extension, Alcatel asserts that its counsel Sharan Goolsby was out of the office unexpectedly due to her husband's triple bypass surgery and that Alcatel needs additional time to respond to this motion. Plaintiff, by and through his attorney, John Burke, has assented to the extension of time, as indicated by the signature below.

RESPECTFULLY SUBMITTED,

ALCATEL USA, INC.


T. Christopher Donnelly (BBO# 129930)
DONNELLY, CONROY & GELHAAR, LLP
One Beacon Street, 33rd Floor
Boston, Massachusetts 02108
(617) 720-2880

Sharan Goolsby, Esq.
Counsel to Alcatel USA, Inc.
DATED: AUGUST 30, 2005

ASSENTED TO:

WILLIAM FOLEY

By his attorney,


John Burke (BBO # 556951)
Dumont, Morris & Burke
14 Beacon Street, Suite 300
Boston, MA 02108
(617) 227-7272

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail/by hand

Date: 8/31/05 